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8 **UNITED STATES DISTRICT COURT**  
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 v.  
13 RANDY ALTON GRAVES (1),  
14 Defendants.

Case No.: 14-CR-1288-DMS

**DECLARATION OF SUPERVISORY  
SPECIAL AGENT KATIE HARDING IN  
SUPPORT OF THE UNITED STATES'  
SENTENCING MEMORANDUM**

18 I, Katie Harding, declare as follows:

19  
20 1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have  
21 been so employed since June 2004. I am currently assigned to the San Diego Field Division  
22 working as the Supervisory Special Agent (SSA) of the San Diego East County Regional  
23 Gang Task Force (ECRGTF) in El Cajon, California. My duties include the supervision  
24 of approximately six FBI Special Agents, three FBI support staff, and 10 federally  
25 deputized Task Force Officers during the investigation and apprehension of individuals  
26 involved in violent gang-related activities as well as drug trafficking and distribution. I

1 provide mentoring and leadership to members of the task force to include approving all  
2 administrative documents and overseeing operations such as surveillances and warrant  
3 service. Prior to my current role, I was a Special Agent assigned to the ECRGTF and the  
4 Violent Crime Task Force-Gang Group, as well as an SSA for the Safe Streets and Gang  
5 Unit at FBI Headquarters. Prior to joining the FBI, I was employed as a Forensic Scientist  
6 with the Oregon State Police. In that position, I processed crime scenes and examined  
7 evidence.

8       2. As a FBI Special Agent and Supervisory Special Agent, I have participated in  
9 over 100 arrests for narcotics-related and gang-related offenses. I have participated in over  
10 20 investigations that involved various investigative techniques, such as undercover  
11 operations, the use of confidential informants, the purchase of controlled substances, the  
12 execution of search warrants, surveillance in connection with narcotic investigations, and  
13 the interview of confidential sources. Through training and participation in these  
14 investigations, I have gained insight into the typical makeup and operation of gangs and  
15 drug trafficking organizations and the various methods these organizations use to carry out  
16 their violent crime and drug trafficking activities.

17       3. I have participated in several investigations into San Diego-area street gangs.  
18 I was the co-case agent on two investigations that led to the arrest and prosecution of nearly  
19 100 Mexican Mafia members, associates, and soldiers. These investigations led to  
20 numerous charges being filed, including racketeering (with predicate acts of murder,  
21 attempted murder, and robbery), extortion, drug trafficking, and various firearms offenses.  
22 We employed a variety of investigative techniques in these investigations, including Title-  
23 III interceptions of wire communications, consensual monitoring of communications,  
24 undercover operations, and confidential informants. I have interviewed dozens of gang  
25 members and associates from Hispanic gangs such as Mexican Mafia and black gangs such  
26 as the West Coast Crips (WCC). Through the course of these investigations, I have gained

1 substantial knowledge of the internal rules and operating codes that govern San Diego  
2 gangs as well as the investigative techniques necessary to investigate them successfully.

3 4. This declaration is being submitted for the limited purpose of establishing  
4 defendant Randy Grave's involvement in the murder of Paris Hill on March 1, 2014. I have  
5 not set forth each and every fact learned during the course of this investigation.

6 5. I served as one of a team of four case agents in Case No. 14-cr-1288-DMS,  
7 United States v. Randy Alton Graves et. al., and in that capacity I am familiar with the facts  
8 of this case. As a case agent for the investigation, I listened to thousands of phone calls by  
9 and between members of the West Coast Crips street gang.

10 6. Based on my review of thousands of intercepted calls by WCC members and  
11 interviews with current and former WCC members (including interviews by other law  
12 enforcement officers who have passed their information on to me), among other things, I  
13 know that in 2013 and 2014, Randy Graves occupied a leadership role in the WCC gang.<sup>1</sup>  
14 As such, Graves supplied other WCC members with narcotics and firearms, and he  
15 enforced WCC rules. Graves specifically enforced the WCC rule against any WCC  
16 member cooperating with law enforcement. Graves frequently spoke about this to other  
17 WCC members and associates. As explained further below, Graves spoke about Paris Hill's  
18 cooperation with law enforcement, and Graves specifically approved Paris Hill's murder  
19 moments prior to the murder, as evidenced by WCC member Terry Hollins' statement that  
20 prior to murdering Hill he received Grave's approval.

21 7. The WCC is extremely hostile to any WCC member or associate who  
22 cooperates with law enforcement. For example, in the fall of 2013, the WCC committed  
23

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24  
25 <sup>1</sup> My review of phone calls associated with this investigation, along with interviews and  
26 observations in court, also provides a basis for identifying the participants in the calls and  
conversations referenced thorough this affidavit.

1 several acts of violence motivated, in part, over perceptions that the victims were  
2 cooperating with law enforcement authorities.

3        8. Similar to other street gangs, the WCC operates according to a code or set of  
4 rules that regulates intra-gang violence. One of those rules is for its members not to  
5 cooperate with law enforcement authorities. WCC members can be killed if cooperation  
6 is proven and approved by senior WCC members. The WCC rules generally prohibit one  
7 WCC member from killing another member except with approval of a senior WCC  
8 member, an “OG,” upon a showing of credible evidence of cooperation. The documentary  
9 evidence is often referred to as “paperwork.”

9. Within a gang, there is a difference between seeing documentation of another  
10 gang member's cooperation and being able to provide "paperwork" to other gang members  
11 to prove that cooperation. There is also a difference between one gang member seeing  
12 documentation and an entire group of gang members repeatedly seeing the documents. It  
13 is much easier for a group of gang members to convince the gang a person is cooperating  
14 than for a single gang member to do so.

16        10. Through my experience investigating gangs, I know it is essential for any gang  
17 with incarcerated members to be able to communicate gang business with members and  
18 associates still in the community.

11. Monitoring in-custody gang members' phone conversations is one way law enforcement officers attempt to monitor a gang's communications between gang members, but for a number of reasons, monitoring phone conversations is a limited investigative tool. First, inmates can, and frequently do, disguise their communications by borrowing from other inmates the phone identification numbers that jails use to keep track of inmate phone calls. Second, inmates frequently use coded language to disguise their communications. Third, even if law enforcement is able to track an inmate's phone calls and decipher the code, it can be very time-consuming to distill the relevant information from many phone

1 calls and, if law enforcement is trying to identify a threat they believe to be imminent,  
2 listening to recorded phone calls is often inadequate to address the threat. Finally, another  
3 method that inmates use to subvert jail phone-call monitoring is the use of three-way calls  
4 to avoid jail-officials identifying the callers.

5 12. An example of the WCC rules against cooperation with law enforcement is  
6 provided by Terry Hollins' interactions with Randy Graves between February 7, 2014, and  
7 early March 2014. As background, in October 2013, WCC member Jeffrey Rees was  
8 stabbed and killed in a fight orchestrated by WCC member and co-defendant Wilbert Ross.  
9 WCC member Paris Hill was present at the scene and provided statements to police. Ross  
10 was charged with murder. In January 2014, the District Attorney's office released  
11 discovery containing Hill's statements to Ross (through his attorney), who was then  
12 detained in county jail. News of Hill's perceived cooperation with law enforcement spread  
13 quickly from the county jail to WCC members outside of the jail.

14 13. On February 7, 2014, Hollins sent Graves a text message requesting an urgent  
15 meeting. Graves described their meeting to co-defendant Solcamire Castro-Hernandez on  
16 an intercepted phone call a few hours later. Graves said his "young general [Hollins]"<sup>2</sup>  
17 was seeking advice about a gang member who was cooperating with law enforcement.  
18 Graves said, "[persons]<sup>3</sup> is facing life sentences and everything . . . they don't think  
19 muthafucka know, this [person] don't think a muthafucka know he done did this shit."  
20 Castro-Hernandez asked Graves if they had "paperwork" [documents showing

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22  
23 <sup>2</sup> Based on the context and timing of the conversation, among other things, I believe  
24 that Graves was referring to Hollins.

25 <sup>3</sup> For purposes of this declaration, the generic term "person" is substituted for Graves'  
26 (and others) use of a more racially charged term carrying similar meaning.  
27  
28

1 cooperation].<sup>4</sup> Graves affirmed and said, “somebody say he thinking he [the suspected  
 2 snitch] might be still working [serving as a confidential informant].” Graves said that he  
 3 told Hollins: “I don’t object . . . whatever you all feel you all need to do . . . handle it . . .  
 4 it’s not like, not an order . . . [it is] in violation and violations get dealt with. Period.”

5       14. Agents immediately began investigating the identity of the person at issue in  
 6 that February 7, 2014, call. Within approximately 10 days, my team had formed a theory  
 7 the person at issue was Paris Hill. That theory was based on intercepted calls referencing  
 8 the suspected cooperator’s association with WCC associate, and co-defendant, Gaqualya  
 9 Lagrone. Agents were aware Lagrone was in a relationship with Paris Hill, and they soon  
 10 became aware Paris Hill was one of the witnesses in Ross’s murder case whose statements  
 11 to law enforcement were disclosed in discovery for that case. Hill had ceased contact with  
 12 his probation officer and law enforcement officers and agents were unsuccessful in locating  
 13 Hill to warn him.

14       15. Intercepted calls indicate that approximately one week prior to Hill’s murder,  
 15 Graves counseled Hollins and approved the murder. On February 22, 2014, during an  
 16 intercepted call, Graves told Lagrone that Hollins was getting stressed about the suspected  
 17 cooperator. Graves said that those who speak to law enforcement must be killed: “if  
 18 mother fuckers been telling, they gotta go . . . I don’t give a fuck if its Kiki [a WCC member  
 19 who was shot multiple times by another WCC member in December 2013] or whoever the

20  
 21  
 22       <sup>4</sup> My interpretations of coded phrases are set forth throughout this declaration in  
 23 brackets. Those interpretations are based on, among other things, my experience as an FBI  
 24 agent and supervisory agent, as set forth above.

25       Grave’s reference to Hollins as “his young general” reflects Grave’s belief that he,  
 26 Graves, held authority over other WCC members. Throughout the investigation Graves  
 27 spoke with the belief that his directives would be obeyed. Other gang members who were  
 28 intercepted also acted with deference to Graves.

1 fuck with the rest of them [persons] that's supposed to be on paperwork [government  
2 documents showing cooperation] . . . they gotta go [be killed], period."

3 16. Paris Hill was shot in the head early in the morning of March 1, 2014, in front  
4 of a night club, the Common Grounds, in San Diego, California. Police found Hill's body  
5 lying on the sidewalk near the corner of 47th street and Federal Boulevard, a short walk  
6 and slightly down-hill from the gate of the Commons Grounds.

7 17. Intercepted phone calls indicate Hollins, Graves, Jermaine Cook and Donald  
8 Bandy were present at the Common Grounds immediately prior to Hill's murder.

9 18. On March 1, 2014, several hours after Hill was murdered, Graves was  
10 intercepted speaking to Castro-Hernandez reflecting on how several gang members were  
11 upset at Hill's murder because "[t]hey don't feel that [persons] got all the paperwork  
12 [documents showing cooperation] and they [are] mad because they said them [persons]  
13 moved only because of cuz [a fellow WCC gang member] word and all this." Graves  
14 explained that if you are a gang member and you see "paperwork" on somebody you need  
15 to "handle you[r] business." Graves went on to explain what he meant by that:

16 If you got reputable [persons] that [are] in place to see this and they said it's  
17 a foul ball and it's a green light [gang authorization to kill someone] or blue  
18 light [the Crip translation for a "green light"] . . . should a mother fucker wait  
19 until after he go through the damage and testify on a mother fucker and give  
20 a mother fucker a life sentence or some more shit or should a mother fucker  
21 handle the business and prevent a mother fucker from doing it [by killing the  
cooperating witness.]

22 Graves further stated:

23 [Persons], this [violent acts against cooperators] is your job [a gang member's  
24 duty and expectation]. . . that's why shit be happening and shit get loose  
25 because some of these [persons] don't want to get up and do what they  
26 supposed to be doing when they supposed to do it. They getting lazy . . .

1 [Person] when duty calls, [person] sometimes you got to step aside cuz you  
2 might save a life [person].

3 19. On March 3, 2014, Graves and Cook were intercepted discussing a young  
4 male who was present at the party, got drunk, and took his shirt off wanting to start a fight.  
5 Graves said he was concerned because that person left his shirt at the scene and the police  
6 could identify that person through the DNA on the shirt, with the inference that the person  
7 would then identify others who were present. Graves told Cook to tell that person to "watch  
8 his fucking mouth." Cook said, "ok, for sure, I'm going to deal with that right now."  
9 Graves added, "Aight, everything else covered but yeah cover that one. Get up on that one  
immediately."

10 20. Also on March 3, 2014, Hollins' pre-trial release was revoked and he was  
11 arrested.

12 21. On March 4, 2014, Cook informed Graves that Hollins had been arrested and  
13 that officers had searched Hollins' house. When Cook began to speak about a new subject,  
14 Graves cut him off and suggested they meet in person. Agents observed Cook meet with  
15 Graves on a pole camera.

16 22. Graves spoke to Bandy following his meeting with Cook. Graves referenced  
17 the individual who left his shirt at the party. Bandy said he knew the person Graves had in  
18 mind and said he had not yet been able to reach him, but would "holler" at him when he  
19 found him. Graves then asked if Bandy had spoken with "Trey-O" [Cook] about a separate  
20 matter that Graves and Cook had discussed. Bandy affirmed. Graves told Bandy to "get  
21 on it" as soon as possible.

22 23. On March 5, 2014, Graves told co-defendant Cleotha Young the District  
23 Attorney had confirmed in open court people were "on paper," cooperating with law  
24 enforcement. Graves said, "its official . . . [persons] is tellin [talking to law enforcement]  
25 . . . they on paper, they done made statements, [person], its official mother fuckers can't

1 say nothing about whatever happened to whoever . . . everyone know it now.” Graves also  
 2 said that, as a result, the WCC would no longer wait until after someone testified:  
 3 “Witnesses gotta go [be eliminated] now!” Graves explained that gang members had the  
 4 “paperwork” but could not pass it out because the distribution of such paperwork would be  
 5 used as evidence against them. Instead, they showed it to fellow gang members. Graves  
 6 said that “BK and them . . . [other WCC members] seen it [paperwork],” and their word  
 7 was sufficient to make it “official.”

8 24. I interpret Graves’ statement “BK and them [persons] seen it” to reference  
 9 Graves receiving confirmation of Hill’s cooperation from his cousin, co-defendant and  
 10 fellow WCC member Darnell Butler, who was then detained along with Hollins in the  
 11 George Bailey Detention Center. I understand Graves to be saying that Wilbert Ross had  
 12 shared with fellow WCC gang members, including Butler, the discovery showing Paris  
 13 Hill had provided statements to law enforcement. Butler, in turn, communicated with  
 14 Graves he had seen the documentation, which was sufficient for Graves.

15 25. Graves then went on to add: “they can’t get this (U/I) cause he’s talking about  
 16 killing that bitch [DF].” “DF” was Terry Hollin’s then girlfriend. Video from a nearby  
 17 convenience store showed Hollins and Hill together in DF’s vehicle the same evening that  
 18 Hill was murdered. Cook and Bandy were also with them.

19 26. The threat to DF, introduced in the March 5, 2014, call, was further explained  
 20 in a March 13, 2014, intercepted call between Graves and co-defendant Brenda Rodriguez.  
 21 Graves said:

22 I swear to God, you can ask that [person] Trey-O [Cook] what I told em, I said  
 23 [person] we’ll have to do [kill] the bitch [DF] . . . the bitch [DF] probably told  
 24 them [law enforcement authorities] the whole plot [what happened the night  
 25 of Hill’s murder] . . . if it was my call to make, I’d snatch that bitch [DF] and  
 26 have that bitch [DF] tied up some mother fucking where . . . next time you all  
 27 see this bitch [DF], it’ll be in a body bag.

1       27. Graves provided specific details that identified DF as the target, and  
2 concluded that because DF was probably in protective custody and out of reach, they  
3 needed to go after DF's family. In particular, Graves stated:

4                     (U/I) fuck how big the family is and what they going to do, . . . we gonna  
5 knock [kill] as many of you mother fuckers off until that time comes . . . we  
6 lose 2-3 homies, 2-3 mother fuckers in your family got to go . . . you run your  
7 mouth, you die, period . . .

8       28. Upon hearing this call, myself and other investigators believed the WCC was  
9 planning the murder of DF and her family. Further, because Hollins was then detained in  
10 the George Bailey Detention Center (GBDF), I believed the topic of DF and her family  
11 was likely the subject of discussion by Hollins and other WCC members detained in that  
12 jail. I know DF was close to Hollins and it would be unlikely for the WCC to act on DF  
13 without some input from Hollins. Law enforcement located and warned DF. DF was  
14 ultimately not harmed.

15       29. Thus, by mid-March 2014, I was aware the WCC had killed Paris Hill because  
16 of his cooperation with law enforcement and was actively planning the murder of DF.  
17 Moreover, I and the other investigators involved in the case had reason to believe the plot  
18 to murder Paris Hill and, to a certain extent, the conspiracy to murder DF had originated  
19 through discussions by WCC members who were then detained within the GBDF.  
20 Throughout this time, I had regular discussions with local law enforcement officers who  
21 were conducting a parallel investigation.

22       30. On March 18, 2014, at the request of detectives with the San Diego Police  
23 Department, San Diego Sheriff's Deputies installed a recording device in a jail cell  
24 occupied by WCC members Hollins, Marcus Foreman, and Darnell Butler.

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1       31. The recording device installed in their shared cell on March 18, 2014, ran for  
2 approximately 72 hours. Over the course of the recording, Hollins made several  
3 statements.<sup>5</sup> These statements include:

i. Excerpt No. 1

5 Foreman: So where was he [Paris Hill]<sup>6</sup> laying anyway?  
6 Hollins: You know, where you come out the gate?  
7 Foreman: The front gate or the back gate?  
8 Hollins: The back gate, probably about ten or fifteen feet.  
9 Foreman: To the left or right?  
Hollins: To the right.  
10 Foreman: Oh, so the way to the street?  
Hollins: Nah man, going down towards the mother fucking police station.  
11 Foreman: Oh out front gate? Oh, I thought the front gate was the one on  
the sidewalk.  
12 Hollins: Yeah.  
13 Foreman: The back gate (U/I) the trail.  
14 Hollins: Ok well yeah . . . like ten feet.  
15 Foreman: Oh so whoever was parked down that way couldn't see  
regardless . . . so whoever was parked up to (U/I).  
16 Hollins: . . .  
17 Hollins: Not when you walk down. . . . We were on the sidewalk walking  
down. . . .  
18 Foreman: Did anybody make a scene? Like, nobody? No bitches? No  
nothing?  
19 Hollins: It's West Coast . . . it's political. . . .  
20 Butler: On the set . . .  
21 Foreman: It's Southeast!  
Hollins: That shit showed me homie.

23       5 The quoted excerpts are based on my best effort to describe what I heard on the  
24 recording, which is at times difficult to decipher due to background noise.

Foreman: If a [person] go through channels, you get your ass knocked down (laughing loudly) . . .

Hollins: If you go through the proper steps . . .

Foreman: You get your ass knocked down.

Unknown: It's vicious . . .

Hollins: (U/I) 911 . . . no running . . . we came back . . . dancing.

6       32. This excerpt describes the exact location of Paris Hill's murder. Paris Hill's  
7 body was found a short distance from the rear gate of the Common Grounds night club.  
8 There is an SDPD office a short distance away, in the same direction. I believe Foreman's  
9 comment that if a person goes "through channels, you get your ass knocked down" and  
10 Hollin's echoing, "if you go through the proper steps" is a reference to seeking, and  
11 receiving, approval to murder Paris Hill.

ii. **Excerpt No. 2**

Hollins: You know me, I know the political stand point. I went back to Sweets [Graves], let me holla at you . . . Sweets [Graves] is looking at me like this, you know what I mean.

Foreman: You already talked about it. Stop talking. Get to it.

Hollins: Nah, not stop talking but he was just like . . .

Foreman: It's blue [referring to Crip authorization to kill a person] it's blue little homie.

Hollins: It's (U/I) possible to hit him right now. You know what I mean. And like Sweets [Graves] and Crazy Mike [not yet identified] was standing right here, right. And we walked in, Crazy Mike just looked at me and looking at me like . . .

Foreman: With that grin?

Hollins: Crip cuz. Look, I felt good, I was like, you know what I mean [person]. Because I've been getting a different response from Mike and them, Kee, like, ever since that like G-homies [senior gang members] that been knowing are always be cracking (U/I) but when that happened I've been getting nods, like, from the [persons] that I want to get the nods from.

1       33. I believe this excerpt is a specific reference by Hollins to receiving Grave's  
2 approval to murder Paris Hill. I know for a Crip the color blue has symbolic significance.  
3 When Hollins describes Grave's approval to Foreman as "looking at me like this, you know  
4 what I mean" Foreman begins to answer, "it's blue little homie," which signifies Grave's  
5 approval. A "blue light" for a Crip gang member is an authorization to kill a person,  
6 borrowing from the phrase "green light" used within the Mexican Mafia. Hollins  
7 corroborates this interpretation when he responds to Foreman's interpretation of Grave's  
8 nod of approval: "It's possible to hit him right now you know what I mean." Based on this  
9 exchange, I believe Grave's specifically approved Hollin's decision to murder Paris Hill  
10 immediately prior to the murder.

### iii. Excerpt No. 3

Hollins: (U/I) cooperation, homie . . . this ain't that heartless.

Butler: He's a homie, [person]. He just didn't know what you was doing and he fucks it up. Point blank period. He fucked up.

Foreman: He knew what he was doing . . .

Hollins: When it was time it's still being like, I seen it all in his face . . . That little [person] is gangsta though. He knew that . . . it was his doing to do that to him. The whole time, you could just see it looked like he was (U/I) crying.

Butler: Like (U/I).

Hollins: On Crip [person].

Butler: I am my brother's keeper. You think you can run, G.

Hollins: I didn't want to look at him. You know what I mean. (U/I) I did it though. Cuz was looking at me like . . . when we left that gate, and went down that hill a little bit and we got to talking a little bit, he was standing there just looking at me. . . . Love him you know, still love him till today. Still love him. Still my [person]. Still gonna look out for your kids<sup>[7]</sup> . . . all that. On Threes [the

7 In March 2014, Hill was a father.

3-Babiez clique], I got him. Still . . . like come on Kee, but you fucked up homie. You fucked up . . . like you was wrong!

2       34. I believe that in this excerpt Hollins justifies his murder of a fellow gang  
3 member by reference to the WCC unyielding rule that cooperators must be killed. Hollin's  
4 states the murder was not heartless, it was required by the WCC code to not tolerate any  
5 cooperation with law enforcement. Butler echoes that sentiment: "[p]oint blank period, he  
6 fucked up." And Foreman finishes the thought, "[h]e knew what he was doing." I believe  
7 Hollins, Foreman, and Butler were each reciting a code revered by WCC leaders, such as  
8 Graves, who not only recite the code generally but, in this case, specifically counselled and  
9 directed Hollins to apply it to Paris Hill. I further believe in the moments prior to Paris  
10 Hill's murder Graves provided the approval necessary for Hollins, Cook, and Bandy to  
11 carry out the murder without fear of reprisal from other WCC members.

13 I declare under penalty of perjury that the foregoing is true and correct to the best of  
14 my knowledge.

16 DATED: July 14, 2022

Katie Harding  
KATIE HARDING  
Supervisory Special Agent, FBI